

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

Ian Alan Olson

Case No.

21-846M(NJ)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 15, 2021 in the county of Waukesha in the
Eastern District of Wisconsin, the defendant(s) violated:

Code Section

18 USC 1389(a)
18 USC 111(a)

Offense Description

Prohibition on attacks on United States servicemen on account of service
Assaulting, resisting, or impeding certain officers or employees

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.



Complainant's signature

FBI Special Agent Justin Mosiman

Printed name and title

Sworn via telephone; transmitted via email
pursuant to Fed. R. Crim. 4.1

Date: March 19, 2021

City and state: Milwaukee, Wisconsin



Judge's signature

U.S. Magistrate Judge Nancy Joseph

Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND
ARREST WARRANT**

I, Justin Mosiman, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), and have been since May 2019. I am currently assigned to the Joint Terrorism Task Force (JTTF) in the Milwaukee Division, where I investigate violations of federal law. I have investigated and assisted in the investigation of matters involving violations of federal law related to domestic terrorism, including the service of search and arrest warrants. Prior to employment with the FBI, I served in the US Navy for six years and provided contract support to the Department of Defense and the Department of Energy for twelve years collectively. Through my training, education, and experience, I have become familiar generally with the efforts of persons involved in criminal activity to store content related their activity. I am one of the case agents assigned to the JTTF conducting investigations that typically pertain to violations of Title 18 of the United States Code.

2. I make this affidavit in support of a criminal complaint and arrest warrant for Ian Alan Olson, who committed violations of 18 U.S.C. § 1389(a) (prohibition on attacks on United States servicemen on account of service) and 18 U.S.C. § 111(a) (assaulting, resisting, or impeding certain officers or employees).

3. Title 18, United States Code, Section 1389(a) provides in relevant part: “Whoever knowingly assaults or batters a United States serviceman . . . or who knowingly destroys or injures the property of such serviceman . . . , on account of the military service of that serviceman or status of that individual as a United States serviceman, or who attempts or conspires to do so, shall” be guilty of a federal crime.

- a. The term “United States serviceman” means “a member of the Armed Forces.” 18 U.S.C. § 1389(c)(3).

4. Title 18, United States Code, Section 111(a) provides in relevant part:

“Whoever—(1) forcibly assaults, resists, opposes, impedes, intimidates, or interferes with any person designated in section 1114 of this title while engaged in or on account of the performance of official duties; . . . shall” be guilty of a federal crime.

- a. Section 1114 includes any officer or employee of any agency of the United States Government, including any member of the uniformed services. A member of the uniformed services includes a member of the Armed Forces. 10 U.S.C. § 101.

5. The facts in this affidavit come from my personal observations, training, experience, and/or information obtained from other law enforcement officers and/or witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and warrant and does not set forth all of my knowledge about this manner.

PROBABLE CAUSE

6. On the morning of March 15, 2021, Ian Alan Olson, drove a 2016 blue Subaru with several orange “Qs”¹ spray painted on it along with the phrases “Trust my plan,” “OMW 2

¹ Based on my training, research, and experience and information provided to me by others, I understand that QAnon is a sprawling, discredited, anti-establishment conspiracy theory that originated from postings on online message boards by an anonymous individual known as “Q.” Q claims to be a high-level government official with a Q clearance and access to classified information. Central to the QAnon conspiracy theory is the false belief that the world is run by a cabal of Satan-worshipping pedophiles and child-traffickers (allegedly largely comprised of prominent Democratic politicians, so-called “Deep State” government employees, journalists, and Hollywood elite) and that President Trump is secretly working with Q and others to take down the cabal. Many QAnon adherents (known as “Anons”) refer to themselves as “digital soldiers” and believe they are engaged in an epic battle between good and evil and darkness and light. Following the November 3, 2020 election, many prominent QAnon adherents exhorted the “Anons” to “trust the plan,” believing that President-Elect Biden’s victory was illusory and part of a convoluted plan by Q and others to reveal the crimes of the cabal to the world, resulting in President Trump securing a second term. QAnon believers are waiting for two major events, which they refer to as the “the Storm” and the

DC,” which is believed to mean, “on my way to Washington DC,” and “WWG1WGA,” which is often used by QAnon supporters meaning “where we go one, we go all.”



7. Olson drove his car to a gas station located across the street from a military base, fueled his vehicle, and then drove in the direction of the military base. Olson pulled along the side of the Wisconsin Army Reserve Center located in Pewaukee, Wisconsin. The reserve center was an active base with uniformed military personnel present. The reserve station is clearly marked with signs noting it is government property.

8. Two members of the U.S. Army Reserve on active drill orders, wearing Army OCP uniforms (camouflage), were standing nearby in the fenced-in parking lot of the reserve station. Olson exited his vehicle, shouted, “This is for America,” and, armed with what appeared to be a rifle, but was in fact an orange in color AR-15 style paintball gun, shot two-to-three

“Great Awakening.” The “Storm” refers to a day of violence which will result in mass arrests, military trials, and executions of the members of the cabal. According to QAnon lore, “the Storm”, will be followed by the “Great Awakening,” which generally refers to the belief that the truth of the central tenets of QAnon will be revealed to the world.

rounds of paintball projectiles at the reservists. The reservists were about 15 yards away from Olson. None of the projectiles struck the reservists.

9. After Olson shot the projectiles, Olson's gun appeared to jam. Olson exclaimed to the reservists, "You're lucky it jammed," or words to that effect. At that point, the reservists, one of whom is a law-enforcement officer, tackled Olson to the ground and held him until law-enforcement officers arrived.

10. After Olson was arrested, Olson's vehicle was taken to the Village of Pewaukee Police Department ("PPD") and PPD officers performed an inventory search of items located inside Olson's vehicle. Inside the vehicle, officers located various items that appear to belong to Olson a digital camera, SD cards, a gas mask, throwing knives, police scanner, two-way radios, a taser, and ballistic military-style vest plates. Olson also had a phone on his person at the time of arrest.

11. Olson initially was booked into the Waukesha County Jail on state charges, including Terrorist Threats and Attempted Battery and Disorderly Conduct. On March 16, 2021, Olson was charged in Waukesha County Circuit Court, Case No. 2021CM000517, with two counts of attempted battery (misdemeanor) and disorderly conduct (misdemeanor). He was released from custody on conditions.

12. On March 15, 2021, during intake at the jail, Olson made unsolicited comments while completing the clothing-exchange process. For example, Olson stated he just returned from Washington, DC, where he attempted to deliver a message. As noted in the photos above, Olson's vehicle appears to reference Washington, DC, stating "OMW 2 DC."

13. Records show that Olson was in Washington, DC, in early March 2021. Specifically, reports from the U.S. Capitol Police ("USCP") state the following:

- a. On March 3rd, Olson approached a National Guardsman, stating he was “maybe going to do something crazy stupid tomorrow” and asked them not to shoot him. Shortly thereafter, USCP stopped Olson, who said he wanted to “test the National Guard tomorrow to see if they were loyal to the people or to the President.”
- b. Olson communicated his understanding that, if he were shot by the National Guard, he would know the National Guard to be loyal to the President; if Olson were not shot, he would know the National Guard to be loyal to the people.
- c. Olson would not expound upon his plans and said he was waiting to be led by God and that his actions would “be big” and he was “willing to die to fulfill this mission.” Olson contended his actions would “be bigger” than jumping the fence, would unite eight billion people, and confirm the loyalty of the National Guard.
- d. Olson stated he would wear ceramic armor for ballistic protection on his back so that the bullets would not go through him and hit civilians. He would not wear similar armor on the front of his body because he was “not afraid to die.”
- e. Referencing March 4, 2021, Olson said he would be “taken over by the Spirit of Christ and lead the people to unity” and “things can only be resolved by the barrel end of a gun.”
- f. The USCP determined Olson was a danger to himself and others, and USCP transported Olson for a psychiatric evaluation.

14. Olson’s actions in Washington, DC, and in Pewaukee, along with various comments described above, show that Olson has considered violence and, in fact, used, attempted to use, and threatened violence against members of the armed forces because of their status as members of the armed forces.

CONCLUSION

15. Based on the forgoing, I submit there is probable cause to believe Ian Alan Olson committed violations of 18 U.S.C. § 1389(a) (prohibition on attacks on United States servicemen on account of service) and 18 U.S.C. § 111(a) (assaulting, resisting, or impeding certain officers or employees).